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Attorneys for Plaintiff,

Carrie Couser

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA**

CARRIE COUSER, on behalf of
herself and all others similarly
situated,

Plaintiff,

vs.

COMENITY BANK and DOES 1
through 10, inclusive, and each of
them,

Defendants.

Case No.: 12-CV-2484-MMA-BGS

**DECLARATION OF PATRICK M.
PASSARELLA**

**RE: COSTS ASSOCIATED WITH
ADMINISTRATION OF CLASS
ACTION SETTLEMENT**

1 I, Patrick M. Passarella, declare:

2 1. I am the Senior Vice President of Operations at Kurtzman Carson
3 Consultants LLC ("KCC"), located at 75 Rowland Way, Suite 250, Novato, California. I
4 am over 21 years of age and am not a party to this action. I have personal knowledge of
5 the facts set forth herein and, if called as a witness, could and would testify competently
6 thereto. I have over 20 years of experience in class action settlement administration.
7 Over the course of my career, I have managed more than 500 class actions and am an
8 expert in claims processing and class action administration.

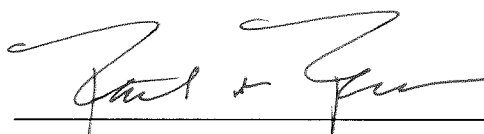
9 2. The purpose of this declaration is to provide the Parties and the Court with
10 accounting of the work performed by KCC related to the Notice Procedures for the
11 *Couser v. Comenity Bank* settlement following the Preliminary Approval.

12 3. KCC was retained by the parties to, among other tasks, mail the double-
13 postcard Legal Notice of Proposed Class Action Settlement and Fairness Hearing and
14 Claim Form (the "Notice"), develop and maintain a settlement website, provide
15 automated phone support to class members, process claims submitted via website and
16 mail, and handle the distribution of funds to approved class members.

17 4. To supplement the direct notice effort, we published the Summary Notice in
18 the national edition of USA Today (1/8 page ad) and provided for 10 million unique
19 internet impressions on the 24/7 Real Media Network.

20 5. From the inception of the administration through December 31, 2014, the
21 costs for administration have totaled \$2,143,942.99.

22
23 I declare under penalty of perjury pursuant to the laws of the State of California
24 that the foregoing is true and correct to the best of my knowledge and that this declaration
25 was executed this 8th day of January 2015 at Novato, California.

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27
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Patrick M. Passarella